

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA**

**IN RE:** ] ] **CHAPTER 11**  
] ] **CASE NO: 15-30116-SDB**  
**MULLIS GARAGE & AUTO PARTS, LLC,** ]  
**DEBTOR.** ]

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**MOTION FOR EXPEDITED HEARING ON MOTION FOR AUTHORITY TO USE  
CASH COLLATERAL AND GRANT REPLACEMENT LIEN**

**COMES NOW** the Debtor who shows this Court the following:

1.

The Debtor as Debtor-In-Possession has filed a Motion for Authority to Use Cash Collateral and Grant Replacement Lien to authorize it to incur secured indebtedness in the use of its cash collateral.

2.

The nature of the Motion requires expedited in hearing inasmuch as if the Debtor does not get permission to use cash collateral it will be unable to continue to operate its business.

3.

The use of cash collateral is in the ordinary course of the Debtor's business. However, since it involves pledging cash collateral as security, the motion requires notice and an opportunity for a hearing.

4.

The Court has authority to set hearings on an expedited basis upon separate Motion and Certificate of Necessity.

**WHEREFORE**, the Debtor respectfully prays that this Court:

a.) expedite the hearing on the Debtor's Motion for Authority to Use Cash Collateral and

Grant Replacement Lien within five days from the date of approval of this Motion or such other time as the Court deems appropriate under the circumstances; and

b.) grant the Debtor any and all further relief as is just.

**SO MOVED** this 1<sup>st</sup> day of May 2015.

**MERRILL & STONE, LLC**

s/Jon A. Levis

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JON A. LEVIS  
ATTORNEY FOR DEBTOR  
GEORGIA BAR NO: 448848

LAW OFFICES:

MERRILL & STONE, LLC  
SECOND FLOOR - MITCHELL BUILDING  
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**CERTIFICATE OF NEED**

**THE UNDERSIGNED** certifies that the Debtor's estate could suffer immediate and irreparable harm unless an expedited hearing is held to consider the Debtor's Motion for Authority to Use Cash Collateral and Grant Replacement Lien inasmuch as inasmuch as if the Debtor does not get permission to use cash collateral it will be unable to continue to operate its business.

**THIS** 1st day of May, 2015.

**MERRILL & STONE, LLC**

**s/Jon A. Levis**

**JON A. LEVIS  
ATTORNEY FOR DEBTOR  
GEORGIA BAR NO: 448848**

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**EMANUEL COUNTY, GEORGIA**

**CERTIFICATE OF SERVICE**

I, Jon A. Levis, of the firm of Merrill & Stone, Attorneys at Law, Post Office Box 129, Swainsboro, Georgia 30401, do hereby certify that I have served a copy of the within foregoing

**MOTION FOR EXPEDITED HEARING ON MOTION FOR AUTHORITY TO USE CASH**  
**COLLATERAL AND GRANT REPLACEMENT LIEN, CERTIFICATE OF NEED, ORDER**  
**ON MOTION FOR EXPEDITED HEARING ON APPLICATION FOR HEARING** to:

Matthew E. Mills, Esq.  
Office of the U.S. Trustee  
Johnson Square Business Center  
2 East Bryan Street, Suite 725  
Savannah, GA 31401

Joshua E. Kight, Esq.  
Attorney At Law  
Post Office Box 816  
Dublin, GA 31040

Edward B. Claxton, III, Esq.  
Edward B. Claxton, III, LLC  
Post Office Box 16459  
Dublin, GA 31040

Mr. Lucas Cowart  
Morris State Bank  
Post Office Box 520  
Dublin, GA 31040

by email and/or mailing a copy through the United States mail with sufficient postage attached thereto to assure delivery.

**THIS** the 1st day of May, 2015.

**MERRILL & STONE, LLC**

**s/Jon A. Levis**

**JON A. LEVIS, ESQ.  
ATTORNEY FOR DEBTOR  
GEORGIA BAR NO: 448848**

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